

# EXHIBIT

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MDL-1570 (GBD) (FM)

BURNETT, ET AL.,

Plaintiffs,

v.

03-CV-5738 (GBD) (FM)

AL BARAKA INVESTMENT AND  
DEVELOPMENT AND CORP., ET AL.,

Defendants.

ASHTON, ET AL,

Plaintiffs,

v.

02-CV-6977 (GBD) (FM)

AL QAEDA ISLAMIC ARMY,

Defendant.

VIDEOTAPED DEPOSITION OF FUAD RIHANI  
New York, New York  
Tuesday, April 22, 2008

Reported by: CAPRICE LATHE  
Job No.: 10523

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April 22, 2008

4:58 p.m.

Videotaped deposition of FUAD RIHANI, held at  
the United States Courthouse for the Southern  
District of New York before the Honorable Judge  
Frank Maas, 500 Pearl Street, Courtroom 20A,  
New York, New York, before Caprice Lathe, a  
Court Reporter and Notary Public within and for  
the State of New York.

1 F. RIHANI

2 King Abdullah that he enjoyed with King Fahd?

3 A I really don't know.

4 Q Sir, you have served in directorship roles  
5 with various organizations, right?

6 A Again, please.

7 Q You have served in directorship roles in  
8 various organizations, correct?

9 A The only private company I worked for is  
10 the Saudi Binladin Organization, and the Mohammed  
11 Binladin Organization, and the Saudi Binladin Group.

12 Q I am talking about other organizations  
13 that you were not employed by, but you served in  
14 directorship roles.

15 A I taught at the North Carolina State  
16 University. I worked for the North Carolina  
17 Department of Transportation. And I worked for the  
18 City of Amman in Jordan.

19 Q What was the city, Amman?

20 A The capital city, Amman, A-M-M-A-N.

21 Q Sir, are you familiar with an entity known  
22 as the International Road Federation?

23 A Yes, I do. I am.

24 Q The short for that is IRF?

25 A IRF, correct.

1 F. RIHANI

2 board of directors, sir?

3 A Washington, D.C. office.

4 Q Have you ever been a board member of the  
5 IRF, sir?

6 A No.

7 Q When did Bakr Binladin join the board?

8 A I would say in the mid 90's.

9 Q And did Mr. Binladin attend the meetings  
10 for the IRF?

11 A The only meeting he attended with the IRF  
12 was in Bangkok, Thailand during the world meeting of  
13 the organization.

14 Q And during his tenure as the director of  
15 the IRF, has he attended in any manner, whether in  
16 person or telephonically or by proxy -- in other  
17 words, somebody else going in his stay -- any other  
18 meetings of the IRF?

19 A Ask the question please, again.

20 Q Let me ask you this: Have you ever  
21 attended any of the IRF meetings in lieu of  
22 Mr. Binladin?

23 A Yes.

24 Q And how many times has that happened, sir?

25 A All the annual meetings since he joined.

1 F. RIHANI

2 Alexandria, Virginia.

3 Q Thank you for the clarification.

4 While you were on the board of the  
5 IREF, you were also employed by SBG, too, correct?

6 A Correct.

7 Q And while you were on the board of the  
8 IREF, you were serving as a representative of SBG?

9 A No.

10 Q Did you report the happenings or the  
11 requests of the IREF to SBG, sir?

12 A No.

13 Q Was SBG a member of the IREF, sir?

14 A No.

15 Q Was SBG a member of the IRF?

16 A Yes.

17 Q In fact, they are a premier member of the  
18 IRF, correct?

19 A I sit on -- my proxy from Baraka Binladin  
20 -- on the board of directors meetings, but I don't  
21 participate in the administrative work.

22 Q Are you familiar with the term "premier  
23 membership" to IREF?

24 A Yes.

25 Q What is that, sir?

1 F. RIHANI

2 A The membership classes of IRF  
3 differentiate between different classes of members  
4 in terms of annual dues. And by paying a higher  
5 premium, they are entitled to attend the meetings  
6 free and attend to -- certain privileges that the  
7 others don't.

8 Q What are the privileges of premier  
9 membership other than the free meetings?

10 A That's mostly it.

11 Q Did SBG sponsor the IRF in any other  
12 manner?

13 A Not outside the -- for IRF, not outside  
14 the annual dues.

15 Q Did SBG provide any monetary support in  
16 any manner to IREF?

17 A Yes.

18 Q And what did they provide, sir?

19 A Contributions to the fellowship program.

20 Q And other than the fellowship program,  
21 anything else?

22 A No.

23 Q When you attended the meetings of the IRF,  
24 you did so on behalf of Bakr Binladin as represented  
25 by SBG, correct?

1 F. RIHANI

2 A Yes.

3 Q And were a number of the meetings for the  
4 Washington-based IRF in the United States, sir?

5 A The meetings?

6 Q Yes, sir.

7 A The meetings could take place anywhere.

8 Q Did any of them take place in the United  
9 States?

10 A Yes.

11 Q And how many of them, to your  
12 recollection?

13 A The majority of them. Savannah, Georgia.  
14 Washington, D.C. In Florida. And, normally, the  
15 IRF annual meeting, they try to make it happen at  
16 the same time with other road-related exhibits or  
17 conferences, and they coordinate the work and the  
18 meetings with the federal highway administration and  
19 with other road-related organizations.

20 Q Why, sir, did it fall to you to go to the  
21 IRF meetings instead of Mr. Binladin?

22 A I don't know. I think it's a matter of  
23 convenience. I'm the only -- as an American  
24 citizen, I don't need a visa to enter the country.  
25 And I think the difficulty of him getting away from



1 F. RIHANI

2 his work. So it was very convenient and it was very  
3 tempting to me because it brought me closer to my  
4 family.

5 Q SBG was a contributor to the future funds  
6 for either IRF or IREF, correct?

7 A The future funds is only related to the  
8 IREF and it is an endowment that was started several  
9 years ago in which they are trying to have enough  
10 money to invest and have resources to support the  
11 fellowship program that they were creating.

12 Q Given your involvement with IRF or IREF,  
13 who are the other members of the organization, sir?

14 A 3M, the equipment manufacturers of the  
15 United States. Caterpillar. Design offices.  
16 Parsons Brinckerhoff. Materials. Manufacturers  
17 like 3M, who are involved in pavement-marking and  
18 signage.

19 But most of them are either  
20 consultants, designers, equipment manufacturers, or  
21 materials manufacturers or contractors. These are  
22 the four classes. And most of the membership in the  
23 Washington office are from the United States. They  
24 have a good contingency from South America and  
25 Central America and they have a good contingency

1 F. RIHANI

2 Q Did you ever do any publications in it?

3 A No.

4 Q Were you ever an editor in either of them?

5 A No.

6 Q Did you ever correspond in any manner with  
7 any of the other individuals that were on the Middle  
8 East Policy Council regarding work that was going on  
9 for the council?

10 A No.

11 Q Did you ever correspond similarly with  
12 anybody concerning work for International Road  
13 Federation?

14 A Yes. We communicate -- I remember  
15 communicating with them. SBG won two international  
16 awards from the IRF and the presentation of the  
17 awards were in Thailand, in Bangkok, and I  
18 corresponded with them about the arrangements and  
19 what's expected of us.

20 Q When was that, sir?

21 A It was three years ago, 2004.

22 Q Where were you living at the time, sir?

23 A I was residing in Jeddah, Saudi Arabia.

24 Q While you were on the Middle East Policy  
25 Council, were you employed by SBG, as well?

1 F. RIHANI

2 time that my job brings me back here to the United  
3 States, definitely, I feel good about it because it  
4 brings me back to my family.

5 Q And how often did you come back to the  
6 United States for that job or working -- doing the  
7 meetings for the IRF?

8 A The annual meetings, in particular, always  
9 brought me here where the meetings were.

10 Q Do the Binladins ever communicate their  
11 interest to you that they wish advocated at the  
12 Middle East Policy Council? Did you ever have  
13 discussions with the Binladins regarding positions  
14 to be advocated or espoused at the meetings of the  
15 Middle East Policy Council?

16 A Never.

17 Q Does the SBG financially support the  
18 Middle East Policy Council?

19 A Yes.

20 Q In what way, sir?

21 A Contributions solicited by the council.

22 Q Do you know financially how much?

23 A I know that the first contribution was  
24 \$200,000. And I know that was reduced to \$100,000  
25 in recent years, annually.

1 F. RIHANI

2 Q So it has in the past been \$200,000  
3 annually --

4 A Yes.

5 Q -- and recently reduced to \$100,000  
6 annually?

7 A Yes.

8 Q Do any of the Binladin family members  
9 contribute separately, sir?

10 A Do other members of the --

11 Q Do other members of the Binladin family,  
12 to your knowledge, contribute separately to the  
13 Middle East Policy Council?

14 A I don't understand the question.

15 Q Apart from the \$200,000, more recently the  
16 \$100,000 contribution, do the individual members of  
17 the Binladin family contribute, as well, to the  
18 Middle East Policy Council?

19 A No.

20 Q No, you don't know or no, they don't?

21 A No, they don't.

22 Q How do you know that, sir?

23 A Because I am on the board of Middle East  
24 Policy Council and I know where the money is coming  
25 from.

1 F. RIHANI

2 to me, so...

3 Q Sir, when did your title change from the  
4 title that is represented on the websites, the  
5 director of research and development, to the title  
6 you told us it changed to today, which is  
7 consultant?

8 A Research, it was ten years ago.

9 Q Ten years ago, sir?

10 A Yes.

11 Q Other than the change in title, was there  
12 any shift that happened at that time that was  
13 particular to that time, sir?

14 A No. It is as a result of my desire to be  
15 back with my family and their desire for me to  
16 continue working for them on important feasibility  
17 studies. So from the time SBG was established until  
18 now, my work was, in a technical term, on call  
19 basis. It is things they could not forecast in  
20 advance.

21 And when the workload went down, my  
22 involvement was done and I was spending more time  
23 with my family in the United States.

24 Q Over the past ten years, how much time  
25 have you spent in the United States per year?

1 F. RIHANI

2 A At least half of my time was in the United  
3 States for different reasons.

4 Q And have you -- is the work on the  
5 feasibility study something that you are capable of  
6 doing from the United States, sir?

7 A Again, please.

8 Q The work that you do on the feasibility  
9 studies, that's something that you are able to do in  
10 the United States, right, sir?

11 A I can do it anywhere in the world. I do  
12 it from all locations in the world. I have a home  
13 in Amman, Jordan and I do the work there. I do it  
14 from my hotel, when I am in a hotel.

15 Q And you do it when you're home in Hickory,  
16 as well, correct?

17 A Yes, I do.

18 Q Did you perform any work for the Mohammed  
19 Binladin Company, sir?

20 A In the old days, yes, I did.

21 Q And have you at any time since the old  
22 days, sir?

23 A No.

24 Q When was the last time you did work for  
25 the Mohammed Binladin Corporation?

1 F. RIHANI

2 A It was in -- I resigned in 1982 from the  
3 Mohammed Binladin Organization.

4 Q Sir, do you have healthcare benefits?

5 A Only in the United States. And  
6 reimbursable costs; that's part of the understanding  
7 under the labor law in Saudi Arabia, that the  
8 employer is responsible for health benefits, health  
9 coverage.

10 Q And SBG provides them, sir?

11 A It reimburses me for any costs incurred  
12 for my healthcare.

13 Q And how long has that been so, sir?

14 A It has been all the time.

15 Q That includes from the time you started  
16 with SBG through till the present, sir?

17 A Yes, sir.

18 Q Are there any other benefits other than  
19 the healthcare benefits, sir?

20 A I reside in a villa that is provided by my  
21 employer. I use a car provided to me by the  
22 employer. And they have assigned an office for me  
23 to work and -- they are headquartered in Jeddah,  
24 Saudi Arabia.

25 Q And do you have a home office in Hickory,

1 F. RIHANI

2 A No.

3 Q Do you do any work for the Binladin family  
4 unrelated to the SBG company business?

5 A No.

6 Q And in September 2000, you accompanied  
7 Bakr Binladin to the UN, correct?

8 A Yes.

9 Q And that was part of SBG business?

10 A No. The king at the time came with a  
11 delegation for the millennium -- United Nations and  
12 he asked a group of Saudi business people, academia,  
13 to accompany him. And my boss, Bakr Binladin, asked  
14 me to join him here in New York for the occasion.

15 Q And were there expenses related to that,  
16 travel expenses of coming up here to New York to the  
17 UN?

18 A No, business.

19 Q Did you take a plane from -- were you  
20 living in Hickory at the time?

21 A Yes.

22 Q Did you take a plane ride from there to  
23 here?

24 A Did --

25 Q Did you take a plane ride from there to



1 F. RIHANI

2 here?

3 A Yes.

4 Q And do you know whether or not you paid  
5 for that personally or were you expensed for that;  
6 did you get reimbursed for your expenses?

7 A No. I was reimbursed for the expense.

8 Q And you indicated that you have attended  
9 meetings for the Middle East Policy Council,  
10 correct?

11 A Yes.

12 Q And have you been reimbursed for your  
13 travel expenses for that, as well?

14 A No.

15 Q No?

16 A No.

17 Q If we looked at Saudi Binladin Group's  
18 expenses for you, they wouldn't show up there?

19 A It's -- they never reimbursed me for  
20 meetings for the Middle East Policy Council.

21 Q Did they reimburse you for expenses for  
22 meetings concerning the International Road  
23 Federation?

24 A Yes, sir, they do.

25 Q How about International Road Federation

1 F. RIHANI

2 Educational Foundation?

3 A Yes, they do. Again, the IREF meetings  
4 are always with IRF meetings. The differentiation  
5 between the two for reimbursement is not an issue.

6 Q Sir, you know Phillip Griffin, correct?

7 A I do.

8 Q And Mr. Griffin, when we met with him and  
9 spoke to him, he told us that you are an advisor to  
10 Bakr Binladin. Is that correct, sir?

11 A Correct.

12 Q Do you advise Mr. Binladin in the capacity  
13 as an employee of SBG or separately?

14 A Again, please.

15 Q Are you compensated separately for  
16 advising Mr. Binladin or is that part of your role  
17 with SBG?

18 A He is my immediate boss.

19 Q What do you advise Mr. Binladin about?

20 A About the results of my work. I receive  
21 instructions of studies and the tasks I am supposed  
22 to do and I report to him the results.

23 Q And what tasks have you been asked to do?

24 A Feasibility studies. Concept development  
25 for projects. And research -- basic research.

1 F. RIHANI

2 Q What kind of research?

3 A A question came up by the higher-ups  
4 whether they could air-condition the open court of  
5 the Grand Mosque in Mecca. And I did the research  
6 and outsourced to the U.S. and other entities  
7 consultants, and carried the research, and presented  
8 the results.

9 Q Sir, how are you paid by the Saudi  
10 Binladin Group; is it a salary or is it hourly or  
11 how?

12 A It has fluctuated over the years and it is  
13 a monthly compensation depending on the load of work  
14 assigned to me.

15 Q How often does it fluctuate?

16 A How often?

17 Q Yes, sir. How often does it fluctuate?

18 A It fluctuated at least once every five,  
19 six years in the last 30 some years.

20 Q I didn't hear the last part.

21 A In the last 30 years, I have been working  
22 with them, with the Mohammed Binladin Organization.  
23 I rejoined them in 1978. Resigned in 1982. And  
24 then went back as a freelance consultant for  
25 studies. And then I joined the Saudi Binladin Group

1 F. RIHANI

2 in 1989.

3 Q Has it always been a monthly compensation?

4 A Most of the time, yes.

5 Q In the past ten years, how much has it  
6 ranged from, from low to high?

7 A In the last ten years, it changed from  
8 \$150,000 to \$250,000.

9 Q In the past two years, what is the range,  
10 sir?

11 A In the last two years?

12 Q The last three years is fine.

13 A The last two years, it is about 220.

14 Q Sir, Mr. Griffin also told us that you  
15 would follow up on business relations that needed  
16 nurturing. What business relations would you follow  
17 up on for SBG?

18 MR. GAUCH: Objection; foundation.

19 THE COURT: Can we hear the question  
20 again?

21 Q Mr. Griffin also told us that you would  
22 follow up on business relations that needed  
23 nurturing. What business relations did you follow  
24 up on?

25 THE COURT: I will sustain the objection.

1 F. RIHANI

2 Q What happened in the late 90's that caused  
3 you to begin telecommuting? I'll put the quotes  
4 around "telecommuting."

5 A Between Hickory and Jeddah, Saudi Arabia?

6 Q Yes, sir.

7 A What do you mean by telecommuting?

8 Q Where you began working from here at times  
9 and sending work over there.

10 A I have been doing this for the last 32  
11 years, not only from Hickory and Washington, D.C.,  
12 but from hotels, Amman and London, and Chifkert  
13 (phonetic). All my work has been telecommunicating.

14 Q Has SBG provided you with equipment in the  
15 way of computers, faxes or telephone lines, or  
16 reimbursed you for such items?

17 A They -- yes, they have.

18 Q What did they reimburse you for, to your  
19 recollection?

20 A I have a work number, different number  
21 than the family number, and they reimburse me for  
22 that. They reimburse me for the fax machine and for  
23 the photocopier. Anything related directly to my  
24 work in Saudi Arabia that I need to use anywhere in  
25 the world, I am reimbursed for it.

1 F. RIHANI

2 Q Do you have any work outside of SBG?

3 A No.

4 Q Have you had any work outside of SBG?

5 A No.

6 Q Do you have a permanent address in Saudi  
7 Arabia?

8 A Yes.

9 Q Do you own property there, sir?

10 A My own?

11 Q Do you own property?

12 A No, I don't.

13 Q Is the only property that you reside in a  
14 property provided by SBG?

15 A Yes.

16 Q Each time you travel between the U.S. and  
17 Saudi Arabia, does SBG need to request a visa?

18 A Does Saudi Arabia --

19 Q Well, do you need a visa at any point when  
20 you travel between here and Saudi Arabia?

21 A Yes, I do in the Kingdom of Saudi Arabia  
22 and in countries that do not give U.S. citizens the  
23 gratis visa status.

24 Q Do you need a sponsor for that visa?

25 A No. But leaving -- entering Saudi Arabia

1 F. RIHANI

2 I use it leaving the country and the last time I use  
3 it entering the country. In between, the only  
4 record is on my passport.

5 Q And how physically are you paid by SBG?  
6 Your -- I know you told me you were paid on a  
7 monthly basis.

8 A It is a bank transfer.

9 Q So it's wired into a bank account?

10 A Yes.

11 Q And where is the bank account, sir?

12 A It is at BB&T, Hickory, North Carolina.

13 Q Do you have a bank account in Saudi  
14 Arabia?

15 A No, I don't.

16 Q And during the time period you worked for  
17 SBG, is it your testimony that you had no other  
18 employment?

19 A While I am working for SBG?

20 Q Yes, sir.

21 A I did not have -- I did not -- if you  
22 could repeat the question, please.

23 Q While you have been working with SBG, have  
24 you had any other employment?

25 A With other people?

1 F. RIHANI

2 Q Yes, sir.

3 A No.

4 Q With other people or with other companies?

5 A I used to be on the board of a German  
6 company that did work for SBG.

7 Q Is that a Ladin company, sir?

8 A It is an architectural firm.

9 Q What is the name of it?

10 A SL.

11 Q SL?

12 A SL, yes.

13 Q And when were you on that company's board?

14 A In the 80's. Late 80's.

15 Q Have you ever been on the board of any  
16 other companies -- have you been on the board of any  
17 other companies other than what we have already  
18 talked about?

19 A No.

20 Q And have you been employed by any other  
21 company other than what we have already talked  
22 about?

23 A Not employment, but I was reimbursed by  
24 the German company for being on the board.

25 Q And have you been paid for any work that



1 F. RIHANI

2 you have done in the United States other than the  
3 work you have done for SBG?

4 A No.

5 Q When SBG employees or executives came to  
6 the United States, would they alert you to their  
7 U.S. travels?

8 A Again, please.

9 Q When SBG executives or employees came to  
10 the United States, would they tell you that they  
11 were coming to the United States?

12 MR. GAUCH: Object as to foundation.

13 THE COURT: Overruled.

14 Q You can answer.

15 A I can answer.

16 No, they don't. Except the time that  
17 Bakr asked me -- told me that he was coming to New  
18 York and asked me to join him.

19 Q Is SBG a member of the Saudi U.S. Chamber  
20 of Commerce?

21 A U.S. Saudi Chamber of Commerce? I don't  
22 know.

23 Q Do you remember attending, in September  
24 through October of 1999 in Washington, D.C., the  
25 annual meeting of the U.S. Saudi Arabian Business

F. RIHANI

Council?

A Yes, I did.

Q Is SBG a member of the U.S. Saudi Arabian Business Council?

A Yes, the Riyadh office. Again, the U.S. Saudi Arabian Business Council has two entities: One headquartered in Riyadh with a chairman and staff and one in Washington, D.C. with a chairman and staff. And the Saudi -- SBG does attend meetings both in Riyadh and Washington, D.C.

Q Were you involved in any conferences in the United States aimed at identifying U.S. business opportunities for SBG?

A No.

Q Have you attended a conference called the USA-KSA Companies Conference?

A USA-KSA?

Q Yes, sir. USA-KSA Companies Conference.

A Companies Conference? No.

Q Do you recall a conference called USA-KSA Companies Conference that was held in Washington, D.C. from June 25 to June 27, 1999?

A The only thing I remember is -- that was in association with the meeting of the U.S. Saudi

1 F. RIHANI

2 Q It says, If you want more information,  
3 contact, and it gives a list of people.

4 Sir, is your name as the last name on  
5 the second line of that next paragraph?

6 A Yes.

7 Q It says contact you with the Saudi  
8 Binladin Group?

9 A Yes.

10 Q Do you recall this, sir?

11 A I do. I participated in the game and the  
12 game was having all the attendants divided into  
13 groups, and the group was given an investment  
14 opportunity. And we were asked to play the game and  
15 command a strategy, how to deal with it, and I was  
16 leading the table I was at.

17 Q Sir, do you know an entity known as MR  
18 International?

19 A MR International?

20 Q Yes, sir.

21 A No, I don't.

22 Q Do know an entity known as Resources  
23 International?

24 A No.

25 Q Are you familiar with an entity called MR

1 F. RIHANI

2 (Off-the-record discussion.)

3 THE VIDEOGRAPHER: We're going off the  
4 record at 6:57 p.m. This is the end of Tape 2.

5 (Recess taken from 6:57 p.m. to  
6 6:59 p.m.)

7 THE VIDEOGRAPHER: This is the beginning  
8 of Videotape 3. We are back on the record. It  
9 is 6:59 p.m.

10 Please, proceed.

11 Q Sir, I'm going to ask you a few questions  
12 other than what that exhibit is for a moment, so  
13 just bear with me for a moment.

14 You work for SBG, correct?

15 A Yes.

16 Q And you work directly for Mr. Bakr  
17 Binladin?

18 A Bakr Binladin.

19 Q And you took directions from Mr. Binladin;  
20 in other words, he was the one that told you what to  
21 do, correct?

22 A Yes.

23 Q And when he told you what to do, you would  
24 do that, correct?

25 A Yes.

1 F. RIHANI

2 Q And you have indicated to us you haven't  
3 worked for anybody other than directly for the Saudi  
4 Binladin Group, correct?

5 A Correct.

6 Q You have never created any other entity or  
7 worked for any other entity other than SBG, correct?

8 Let me rephrase it.

9 You have never created any other  
10 entity other than the MR that we just talked about,  
11 correct?

12 A Correct.

13 Q And that was just something for tax  
14 purposes; it wasn't somebody that you actually did  
15 work for, correct?

16 A For IRA purposes, contribution purposes.

17 Q It wasn't a consulting company that you  
18 worked for, correct?

19 A Correct.

20 Q And your work for SBG was as an employee  
21 for SBG, correct?

22 A While I was doing work for SBG.

23 Q Yes, sir. Is there anything other than  
24 that?

25 A No, you said employed. My position is not

1 F. RIHANI

2 the typical standard employment contract. I am not  
3 an employee of SBG.

4 Q Who are you an employee of, then, sir?

5 A I am a freelance consultant that -- I had  
6 the chance to do no work except for SBG for the  
7 last -- since 1989.

8 Q And there's no corporate entity that you  
9 work for other than the work that you perform for  
10 SBG, correct?

11 A The only example I gave you is on the  
12 board of SL in Germany.

13 Q And when SBG hired you to perform the work  
14 that they hired you to perform -- is there any  
15 written contract that you have with SBG?

16 A No, I don't.

17 Q It is only an oral contract?

18 A Yes.

19 Q And you get paid based on what you do for  
20 them monthly, correct?

21 A Yes.

22 Q The exhibits that we have marked as  
23 Exhibit 7 and 8 --

24 A Yes.

25 Q -- does this refresh your recollection as